

1 [COUNSEL LISTED AT END]
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5 UNITED STATES DISTRICT COURT
6 NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION
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8 TRANSPERFECT GLOBAL, INC.,
9 TRANSPERFECT TRANSLATIONS
INTERNATIONAL, INC., AND
TRANSLATIONS.COM, INC.,

10 Plaintiffs/Counterclaim
11 Defendants,

12 v.

13 MOTIONPOINT CORPORATION,

14 Defendant/Counterclaim
Plaintiffs.

Case No. CV 10-02590 CW (JCS)
ELECTRONIC CASE FILING

**JOINT STIPULATION AND
[PROPOSED] ORDER TO STAY
DISCOVERY AND SETTING
BRIEFING SCHEDULE**

Date: May 25, 2012
Time: 9:00 A.M.
Judge: Hon. Joseph C. Spero

19 **STIPULATION**

20 WHEREAS, TransPerfect has notified the Court that it intends to file a motion
21 ("Disqualification Motion") to disqualify McDermott Will & Emery LLP as counsel for
22 defendant and counterclaim plaintiff MotionPoint Corporation.

23 WHEREAS, at the Court's direction, the Parties have met and conferred regarding an
24 expedited briefing schedule for TransPerfect's Disqualification Motion and a brief stay in
25 discovery.

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JOINT STIPULATION AND [PROPOSED]
ORDER TO STAY DISCOVERY AND SETTING
BRIEFING SCHEDULE

Case No. CV 10-02590 CW (JCS)

1 THEREFORE, the Parties hereby stipulate to the following:
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3 Event or Filing	Joint Proposed Dates
4 TransPerfect To File Its Disqualification Motion	Friday, May 25, 2012
5 MotionPoint To File Its Opposition	Friday, June 1, 2012
6 TransPerfect To File its Reply	Wednesday, June 6, 2012
7 Hearing Monday, 6/18/12 at 3:00 p.m., (special setting) before Mag. Judge Spero	Friday, June 8, 2012 or as soon thereafter as the Court's schedule will accommodate.

9 The Parties further agree that no discovery take place from now until the Court issues an
 10 Order resolving TransPerfect's Disqualification Motion.

11 The Parties do, however, dispute the scope of post-stay discovery rights of the Parties,
 12 but agree that presentation and resolution of that dispute be deferred until or after (at the Court's
 13 direction) the Court's Hearing on TransPerfect's Disqualification Motion.

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 15 **SO STIPULATED.**

16 Dated: May 24, 2012

McDERMOTT WILL & EMERY LLP

17
 18 */s/ Philip Ou*
 ANTHONY DE ALCUAZ (SBN: 65599)
 PHILIP OU (SBN: 259896)
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 ALEXANDER OTT (admitted *pro hac vice*)

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 26 *Attorneys for
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1 Dated: May 24, 2012

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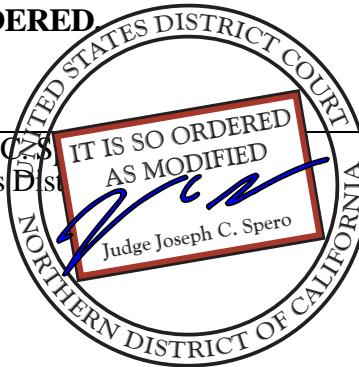
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Attorneys for Plaintiffs/Counterclaim Defendants
TransPerfect Global, Inc.; TransPerfect Translations
International, Inc.; and Translations.com, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 05/25/12

Hon. Joseph C. Spero
United States District Court



1 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic
2 filing of this document has been obtained from the other signatories.
3

4 Dated: May 24, 2012

/s/ Philip Ou

5 PHILIP OU

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